

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	CRIMINAL NO. 17-CR-2558 MV
)	
vs.)	
)	
ARTHUR PERRAULT,)	
)	
Defendant.)	

UNITED STATES' UNOPPOSED MOTION FOR PROTECTIVE ORDER

Pursuant to Federal Rule of Criminal Procedure 16(d)(1), the United States respectfully moves this Court to enter a stipulated protective order governing the discovery process in this case. In support of its motion, the United States submits the following:

The defendant, Arthur Perrault (hereinafter, "Defendant"), is charged in the indictment, Doc. 2, with aggravated sexual abuse and abusive sexual contact. These charges involve conduct with a child under the age of twelve. The United States anticipates producing material to defense counsel that contains personal identification information for the victim and other sensitive information about the victim, including the nature of Defendant's alleged abuse.

The United States is concerned that dissemination of this type of information would have serious privacy implications for the victim. Furthermore, given the scope of the material and the nature of the information to be produced to Defendant, the United States does not believe it is feasible to redact all the private information.

Undersigned counsel has conferred with Defendant's attorney, Samuel Winder, about this matter. The parties have agreed that an appropriate resolution is the issuance of a protective order governing discovery in this case. The parties have agreed on the terms of such a proposed

protective order, a copy of which will be emailed to the Court contemporaneously with the filing of this motion.

For the foregoing reasons, the United States respectfully requests that the Court enter a stipulated protective order, the terms of which have been agreed to by both parties.

Respectfully submitted:

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/s/ Filed electronically
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I HEREBY CERTIFY that I filed the foregoing pleading electronically through the CM/ECF system which caused the opposing party of record to be served by electronic means, as reflected on the Notice of Electronic Filing, and other methods of service as indicated therein on September 27, 2018:

/s/
Sean J. Sullivan
Assistant United States Attorney